

Susan E. Coleman (SBN 171832)  
E-mail: scoleman@bwsllaw.com  
BURKE, WILLIAMS & SORESENSEN, LLP  
444 South Flower Street, 40<sup>th</sup> Floor  
Los Angeles, California 90071-2942  
Tel: 213.236.0600 Fax: 213.236.2700

Attorneys for Defendant CALEB GARCIA ALAMILLA

HYDEE FELDSTEIN SOTO, City Attorney (SBN 106866)  
DENISE C. MILLS, Chief Deputy City Attorney (SBN 191992)  
KATHLEEN KENEALY, Chief Assistant City Attorney (SBN 212289)  
TY A. FORD, Deputy City Attorney (SBN 218365)  
200 North Main Street, 6th Floor, City Hall East  
Los Angeles, CA 90012  
Tel: 213.978.6900 Fax: 213.978.8785  
Email: [Ty.Ford@lacity.org](mailto:Ty.Ford@lacity.org)

Attorneys for Defendant CITY OF LOS ANGELES

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEXANDRA RASEY-SMITH;  
GORDON GENE MACCANI; and  
JANET MACCANI,

Plaintiffs,

v.

CITY OF LOS ANGELES; CALEB  
GARCIA ALAMILLA; and DOES 2-  
10, inclusive,

Defendants.

Case No. 2:24-cv-03265-MWC-SSC

**DEFENDANTS' NOTICE OF  
MOTION AND MOTION FOR  
LEAVE TO LODGE VIDEO  
EXHIBITS UNDER SEAL IN  
SUPPORT OF THEIR MOTION  
FOR PARTIAL SUMMARY  
JUDGMENT**

*Filed concurrently with Declaration of  
Susan E. Coleman; and [Proposed]  
Order*

Judge: Hon. Michelle Williams Court  
Date: December 26, 2025  
Time: 1:30 p.m.  
Crtrm: 6A

Trial Date: April 6, 2026

TO THE HONORABLE COURT, ALL PARTIES, AND TO THEIR  
ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Defendants City of Los Angeles and Caleb Garcia Alamilla (“Defendants”) will and hereby do move the Court, pursuant to Local Rule 79-5, for leave to lodge under seal the three video exhibits submitted as exhibits of Caleb Garcia Alamilla and Colin Chomuk, which are being filed concurrently with Defendants’ Motion for Partial Summary Judgment. Good cause exists to lodge these three video exhibits under seal because the surveillance and body worn camera footage contains sensitive information that is subject to the Court’s Protective Order in this matter (ECF No. 36). They were produced as confidential and subject to the protective order.

**I. MATERIALS REQUESTED TO BE SEALED**

Defendants seek to lodge under seal the following items (collectively, the “Video Exhibits”):

1. **Exhibit A** to the Declaration of Defendant Caleb Garcia Alamilla: surveillance video footage (DEF2520) depicting the events that occurred in the fourth floor hallway on February 3, 2024.
2. **Exhibit B** to the Declaration of Defendant Caleb Garcia Alamilla: footage from Defendant Garcia’s body worn camera (DEF2521) depicting the events that occurred in the fourth floor hallway on February 3, 2024.
3. **Exhibit A** to the Declaration of Officer Colin Chomuk: footage from Officer Chomuk’s body worn camera (DEF2504) depicting the events that occurred in the fourth floor hallway on February 3, 2024.

These materials will be manually lodged under seal pursuant to Local Rule 5-4.2 because they consist of video files not conducive to electronic filing through CM/ECF. A Notice of Manual Lodging (Form G-92) will accompany the lodged Video Exhibits.

///

///

///

1 **II. GROUNDS FOR SEALING**

2 It is true that there is a strong presumption in favor of public access to judicial  
3 records and against sealing. *See Kamakana v. Cty. & Cnty. of Honolulu*, 447 F.3d  
4 1172, 1180 (9th Cir. 2006); *Nixon v. Warner Comm., Inc.*, 435 U.S. 589, 597  
5 (1978); *Globe Phillips ex rel. Estates of Byrd v. General Motors Corp.*, 307 F.3d  
6 1206, 1212 (9th Cir. 2002). As such, if a court decides to seal judicial documents  
7 and records in a case, it must identify the compelling interest and articulate the  
8 factual basis for its finding “without relying on hypothesis or conjecture.”  
9 *Kamakana*, 447 F.3d at 1179.

10 Good cause exists to seal the Video Exhibits because they contain: (1)  
11 sensitive depictions of the decedent at the scene, including him being shot and  
12 medical response efforts; and (2) law-enforcement tactics and operational details  
13 that are not suitable for public disclosure. The Video Exhibits were produced in  
14 discovery in this matter pursuant to the Court’s Protective Order (ECF No. 36),  
15 which prohibits public disclosure of confidential materials and expressly provides  
16 that any violation of the order may be punished by any and all appropriate measures,  
17 including contempt proceedings and/or monetary sanctions. Disclosure of these  
18 videos on the public docket would compromise privacy interests, risk misuse of  
19 sensitive content, and subject Defendants to contempt for violating the Protective  
20 Order. Sealing is therefore narrowly tailored to protect those interests while still  
21 preserving public access to written materials (Defendants’ Motion for Partial  
22 Summary Judgment) that summarize the evidence.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **III. CONCLUSION**

2 For the foregoing reasons, Defendants respectfully request that the Court  
3 grant leave to lodge the Video Exhibits under seal and direct the Clerk to maintain  
4 the lodged videos under seal unless otherwise ordered by the Court.

5 Dated: November 7, 2025

BURKE, WILLIAMS & SORESENSEN, LLP

6  
7  
8 By: Susan E. Coleman

9 Susan E. Coleman  
10 Attorneys for Defendant  
CALEB GARCIA ALAMILLA

11 Dated: November 7, 2025

LOS ANGELES CITY ATTORNEY

12  
13  
14 By: Ty A. Ford

15 Ty A. Ford  
16 Attorneys for Defendant CITY OF  
LOS ANGELES

17 **ELECTRONIC SIGNATURE CERTIFICATION**

18 I, Susan E. Coleman, hereby attest that all other signatories listed, and on  
19 whose behalf the filing is submitted, concur in the filing's content and have  
20 authorized the electronic filing.

21 Dated: November 7, 2025

BURKE, WILLIAMS & SORESENSEN, LLP

22  
23  
24 By: /s/ Susan E. Coleman

25 Susan E. Coleman  
26 Lauren S. Dossey  
27 Attorneys for Defendant  
CALEB GARCIA ALAMILLA